

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

Case No. 1:23-cr-95

Plaintiff,

v.

Hon. Robert J. Jonker

RASHAD MALEEK TRICE,

Defendant(s).

GOVERNMENT'S
INITIAL PRETRIAL CONFERENCE
SUMMARY STATEMENT

I. DISCOVERY

A. Statements of Defendant

1. Oral Statements (Rule 16(a)(1)(A))

☐

There are no written records of oral statements or other oral statements as defined in Rule 16(a)(1)(A).

☒

There are the following written records of oral statements:

- St. Clair Shores PD report re: 7/3/23 arrest
- FBI reports regarding interviews on July 3, 4, 5, and 6, 2023

The substance of which

☐

has been disclosed to defense counsel.

☒

will be disclosed to defense counsel by upon entry of pro. order.

2. Written or Recorded Statements (Rule 16(a)(1)(B))

☐

There are no written or recorded statements or grand jury testimony of defendant.

☒

There are the following written or recorded statements or grand jury testimony:

- St. Clair Shores body camera from 7/3/23 arrest
- recordings of interviews on July 3, 4, 5, and 6, 2023

All written or recorded statements

☐

have been disclosed to defense counsel.

☒

will be disclosed to defense counsel by upon entry of pro. order.

B. Defendant's Prior Record (Rule 16(a)(1)(D))

- ☐ The Government has made due inquiry and is not aware of any prior criminal record.
- ☒ The Government has disclosed defendant's prior criminal history.
- ☐ The Government is now making inquiry into defendant's prior criminal history. The results will be disclosed to defense counsel upon receipt.

C. Documents and Tangible Objects (Rule 16(a)(1)(E))

- ☐ The Government has no documents, tangible objects, or physical evidence required to be disclosed.

- ☒ The Government has the following documents, tangible objects, and physical evidence:

☐ Drug Paraphernalia ☐ Drug Records ☐ Inventory (attached)

☐ Controlled Substances: _____

☒ Records: _____ cell phone call detail records, license plate reader data

☐ Firearms: _____

☒ Other: _____ photos, cell phone extraction data, cell phone cord, 911 calls, knives

- ☒ The Government voluntarily notifies the defendant of the following search warrants issued and the warrant returns:

☒ State *from 54A District Court: Defendant's cell phone, Beaujardin apartment,*

☒ Federal: *Defendant's DNA, Chevrolet Impala*

Case No. EDMI #5:23-mc-51150

Re: (1) Roselawn residence, (2) cell phone (313) ***-*634, (3) person of TH,
(4) Sunset apartment, (5) cell phone (313) ***-*622, (6) person of LT

- ☒ They have been made available for inspection and copying by defense counsel.

- ☒ Defense counsel should make arrangements with:

AUSAs Jonathan Roth & Doaa Al-Howaishy

D. Reports of Examinations and Tests (Rule 16(a)(1)(F))

- ☐ The Government has no reports of examinations or tests required to be disclosed by Rule 16.

- ☒ The Government has or expects to have reports of the following examinations and tests:

☐ Drug Analysis ☐ Handwriting ☐ Fingerprints

☒ DNA ☐ Firearms/Nexus ☒ Gun Operability

☐ Computer Forensics ☒ Other: _____ forensic pathologist, forensic

entomologist, cell site location data analysis, tire print comparison

E. Reciprocal Discovery

- ☒ The Government seeks reciprocal discovery.

F. Notice Under FRE 404(b)

- ☒ The Government does not presently intend to introduce 404(b) evidence.
- ☒ The Government does presently intend to introduce the following 404(b) evidence:

The Government does not believe that it is 404(b) evidence, but intends to introduce evidence of the rape and assault that Defendant committed against the minor victim's mother immediately prior to abducting the minor victim.

- ☐ The Government will provide pretrial notice of 404(b) evidence by _____.

G. Other Discovery Matters

II. TRIAL

- A. The Government requests a ☒ jury ☐ non-jury trial.
- B. The length of trial excluding jury selection is estimated at 8 days.

III. MISCELLANEOUS

The parties acknowledge that if the case is appropriate for expedited resolution, a joint motion for expedited sentencing shall be filed within 14 days of arraignment.

- ☒ The Government is unaware at this time of any known conflict with defendant's representation by counsel. The United States will immediately advise counsel if any such conflict becomes known.
- ☐ The Government is aware of the following potential conflicts:

- ☒ Government's plea negotiation policy:

No concessions unless plea hearing is completed at least 3 weeks before FPTC.

Date July 27, 2023

Jonathan Roth
Counsel for the United States